

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE

Docket No. N2011-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
AUGUST 30, 2011 DAVID B. POPKIN MOTION**
(September 6, 2011)

On August 30, 2011, David B. Popkin filed a motion¹ (the “Motion”) commenting on the Notice of United States Postal Service filed on August 19, 2011.² The Motion contends that the Postal Service has not provided certain latitude and longitude data, and that “it has not provided the justification for non-public treatment [of finance numbers] as required by Commission Rule 3007.21.” As described below, the information sought in the Motion has been provided by the Postal Service and is available on the Commission’s website.

Because the Postal Service has already provided the information sought in the Motion, there is no basis to the Motion’s apparent claim that the latitude/longitude data have not been furnished. The latitude/longitude data sought by the Motion appear beginning on page 651 of the document filed on August 19, 2011, entitled FDB CMN Core.pdf.³

The Postal Service has also provided a justification for the non-public treatment of finance numbers. On July 27, 2011, the Postal Service filed an

¹ David B. Popkin Motion, PRC Docket No. N2011-1 (August 30, 2011).

² Notice of the United States Postal Service, PRC Docket No. N2011-1 (August 19, 2011).

³ This is document 3 under Mr. Popkin’s numbering system.

application for non-public treatment addressing the information redacted in Library Reference USPS-LR-N2011-1/4. Notice of United States Postal Service of Filing of Initial Library References and Application for Non-Public Treatment of Materials, PRC Docket No. N2011-1 (July 27, 2011). Other applications for non-public treatment provide additional information regarding the non-public nature of finance numbers. See, e.g., Notice of United States Postal Service of Filing of Library References USPS-LR-N2011-1/NP5 and USPS-LR-N2011-1/9 and Application for Non-Public Status, PRC Docket No. N2011-1 (August 30, 2011).

The Motion seeks information already provided by the Postal Service, and the Postal Service has adequately justified the nonpublic filing of finance numbers. Thus, the Motion should be denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel, Global Business

Kenneth N. Hollies
James M. Mecone
Michael T. Tidwell
Attorneys

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
(202) 268-2998; Fax -6187
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